

March 6, 2003

David R. Moffitt, Esquire
SAUL EWING, LLP
Center Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186

RE: AXIS Construction Corp. v. Landmark Building Systems, Inc., et al.
U.S.D.C., E.D.Pa., No. 02-cv-3017

Dear Mr. Moffitt:

To follow up my request for documents identified in your client's depositions, kindly provide me with copies of the specific documents set forth below. These requests supplement our prior formal Request for Production for which we will also require your client's complete and timely responses.

- 1) Axis' letters requesting close out documentation from Landmark on Winthrop job;
- 2) All records concerning the quotes from subcontractors and Axis' estimate for the Plainedge Project, including files tabbed "job costs" and "project costs";
- 3) HMJ and B & G proposal and subcontract documents;
- 4) Subcontracts issued to other subcontractors for the Plainedge Project which include quotations and scope of work required by each subcontractor;
- 5) Records, including notes or pictures, regarding Payment Application No. 6 which indicate items not performed by Landmark;

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- 6) Any records concerning discussions at the meeting between Bob Wihlborg, Ken George, Sr. and Doug George which took place at the law offices of Cooper, Rose & English in New Jersey;
- 7) Axis' phone bills for the months of January, 2002 through March, 2002 for any telephones used by Axis to communicate with Landmark's subcontractors;
- 8) Copies of notices of liens or intent to lien or file claim against bond received by Axis;
- 9) Legible documents describing all electrical work done by B&G, whether or not charged to Landmark;
- 10) All correspondence, communications, billing and payment records, including extras and backcharges, concerning electrical work performed by HMJ;
- and 11) Electrical drawing marked up by Bob Wihlborg indicating existing actual locations of outlets as delivered by LBS and conformance to the contract for Schwarting or John West School;
- 12) Any and all submissions by Axis to the Owner for payment for additional work charged to Landmark;
- 13) Documentation from Ryant including purchase order, contract and/or all bills on the Project;
- 14) Daily job logs and all pictures taken concerning the ceiling work performed by East Hills and backcharged to LBS;
- 15) Daily work logs, backup and/or breakdown for invoice nos. 3976 and 3949 dated July 23 and August 2, 2002 on John West Project concerning work performed by Champion;
- 16) Axis superintendent logs or daily reports for the Plainedge Project;

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- 17) All correspondence, billing and payment records for Chinetz subcontract to provide project management and superintendent;
- 18) All documents concerning change orders, claims by Axis for additional compensation and allocation of change order allowance for the modular building prime contract held by Axis with the Owner;
- 19) Current punch lists for Pioneer Window window repairs;
- 20) Complete set of Axis payment requisitions to the owner, including all back up, subcontractor invoices and certified payroll reports.

Please feel free to contact this office if you have any questions concerning the above requests.

Very truly yours,

Francis X. Clark

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cc: Landmark Building Systems, Inc.

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